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Attorneys for Janina M. Hoskins,
Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re

201 EL CAMINO REAL, LLC,

Debtor.

Case No. 23-30465-DM

Chapter 7

HU-HANTWO LLC, derivatively on behalf
of 201 El Camino Real, LLC,

Plaintiff,

v.

NARIMAN SEYED TEYMOURIAN; 2700
MIDDLEFIELD ROAD LLC; PALADIN
FUNDING, INC.; BAYTECH HOLDINGS,
LLC; and DOES 1-50,

Defendants,

and

JANINA M. HOSKINS, as Chapter 7
Trustee of 201 El Camino Real, LLC,

Nominal Defendant,

Defendants.

Adv. Proc. No. 25-03039-DM

**NOTICE OF LIMITED APPEARANCE
AND STATEMENT OF NON-
AUTHORIZATION**

1 Janina M. Hoskins (the “Trustee”), the duly appointed, authorized and acting trustee of
2 the above-referenced bankruptcy estate, by and through undersigned counsel, submits this
3 limited appearance for the sole purpose of notifying the Court that the Trustee did not authorize
4 the filing of the above-captioned adversary proceeding in her name or on behalf of the estate, and
5 Michael B. Lubic, his co-counsel, and his firm, K&L Gates LLP (collectively, “K&L Gates”),
6 did so against the Trustee’s express instructions.

7 1. The Adversary Complaint filed in this case purports to assert claims on behalf of
8 and/or owned by estate.

9 2. The Trustee does not have a retainer agreement with K&L Gates, and K&L Gates
10 has not been employed by the estate or approved by the Court as special counsel.

11 3. The Trustee has not authorized, ratified, or consented to the initiation of this
12 adversary proceeding, and K&L Gates filed the Adversary Complaint without the Trustee’s
13 authority.

14 4. By this filing, the Trustee makes a limited appearance solely to inform the Court
15 of this lack of authorization. The Trustee does not appear generally, does not waive any defenses,
16 objections, or immunities, and does not consent to jurisdiction for any other purpose.

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18 Dated: September 30, 2025

FINESTONE HAYES LLP

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20 /s/ Jennifer Hayes

Jennifer Hayes

21 Attorneys for Janina M. Hoskins,

22 Chapter 7 Trustee
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